

**JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION  
SOLICITATION HSCG38-08-Q-010024**

Pursuant to the requirements of FAR PART 6, this justification for other than full and open competition is supported by the following facts and rationale in the format described at FAR 6.303-2:

**(1) Identification of the agency and the contracting activity, and specific identification of the document as a “Justification for other than full and open competition.”**

The U.S. Coast Guard, Aircraft Repair and Supply Center (ARSC), CASA HC-144A Product Line Division, Elizabeth City, North Carolina, hereby presents this justification for other than full and open competition (JOTFOC).

**(2) Nature and/or description of the action being approved.**

This justification for Other Than Full and Open Competition seeks approval for a limited source acquisition, for a firm-fixed price, firm-fixed quantity contract for the acquisition of **software packages and a fire adaptor**.

**(3) A description of the supplies or services required to meet the agency’s needs (including the estimated value).**

This justification for other than full and open competition is to procure **software packages and a fire adaptor**. This requirement is part of the newly acquired CASA HC-144A aircraft.

**(4) An identification of the statutory authority permitting other than full and open competition.**

10 U.S.C. 2304(c) (1), as implemented by FAR 6.302-1 (a) (2).

**(5) Demonstration that the nature of the Acquisition requires use of the authority cited.**  
This procurement must be restricted to **Enertec Zodiac Data Systems**, OEM.

**(6) A description of efforts made to ensure that offers are solicited from as many potential sources as is practicable.**

This action will be solicited utilizing the streamlined synopsis/solicitation procedures for commercial items authorized in FAR 12.603; therefore, a presolicitation synopsis will not be issued.

**(7) A determination by the contracting officer that the anticipated cost to the Government will be fair and reasonable.**

It is the Contracting Officer’s opinion that prices will be determined fair and reasonable based on a comparison to historical pricing information and the Government estimate.

**(8) Description of the Market Research.**

The market survey consisted of utilizing the Inventory Locator System (ILS) and internet data. Market research has indicated that this requirement is commercial in nature and is currently being procured for a variety of aircraft, both military and commercial.

**(9) Any other facts supporting the use of other than full and open competition, i.e., proprietary data packages, etc.**

The CASA aircraft are being procured by Coast Guard Headquarters. Coast Guard Headquarters have tasked ARSC with support of three HC-144A aircraft for the next 24 months. **Enertec Zodiac Data Systems is the OEM and sole source for the software packages and a fire adaptor**.

The actual lead-time for this requirement is **4 months**. The USCG did not purchase data rights as part of the initial system acquisition for the HC-144A aircraft. The manufacturing drawings, data and special

tooling necessary for full and open competition are proprietary and available only to the Spanish manufacturer. The performance and acceptance data are also proprietary. The USCG does not have adequate technical descriptions to enhance competition.

**(10) A listing of the sources, if any, that expressed in writing, an interest in the acquisition.**

IAW FAR 5.201, the intent to contract for these parts will be submitted to [WWW.FBO.GOV](http://WWW.FBO.GOV). If responses to the synopsis indicate sources available, the file will be documented accordingly and the requirement competed among all eligible offerors.

**(11) A statement of the actions, if any, the agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the supplies or services required.**

The Coast Guard did not purchase the data as part of the initial system acquisition for the HC-144A aircraft; as a result, it would be difficult to foster a competitive procurement effort. Complete specifications and drawings are not available and the cost to procure them is not easily quantifiable. As the AICP, ARSC is tasked with supporting systems that have been deployed for use in the aviation community. As such, our budget does not include funding to procure data for these systems. The data for manufacturing these parts are proprietary to the OEM and therefore future competition for this effort is not known. The agency has taken no actions to overcome barriers to competition and does not anticipate any opportunities to do so. However, in an effort to increase competition among the distributors, the CASA Product Line members annually attend aviation trade shows, conduct extensive Internet database research, and procurements are advertised in [WWW.FBO.GOV](http://WWW.FBO.GOV).

I hereby certify that the supporting data that are the responsibility of requirements personnel and which form a basis for this justification are complete and accurate.

**(12) Contracting Officer's Certification**

I certify that the data supporting the recommended use of other than full and open competition is accurate and complete to the best of my knowledge.

Date: \_\_\_\_\_

\_\_\_\_\_  
**Linda D. Clark**  
Contracting Officer

**Technical / Requirements Personnel Certification**

I certify this requirement meets the Government's minimum need and that the supporting data, which forms a basis for this justification, is complete and accurate.

Date: \_\_\_\_\_

\_\_\_\_\_  
Kevin S. Barrick  
CWO, CASA Product Line

**APPROVAL:**

Date: \_\_\_\_\_

\_\_\_\_\_  
**Linda D. Clark**  
Contracting Officer